



# United States Department of the Interior

## NATIONAL PARK SERVICE

1849 C Street, N.W.  
Washington, D.C. 20240

IN REPLY REFER TO:

FEB 27 2009

**Re: Central Shoe Building, 1635 Washington Avenue, St. Louis, Missouri**  
**Project Number: 16111**

Dear

My review of your appeal of the decision of Technical Preservation Services, National Park Service, denying certification of the rehabilitation of the property cited above is concluded. The appeal was initiated and conducted in accordance with Department of the Interior regulations (36 CFR Part 67) governing certifications for Federal income tax incentives for historic preservation as specified in the Internal Revenue Code. Thank you and for meeting with me in Washington on January 5, 2009, and for providing a detailed account of the project.

After careful review of the complete record for this project, I have determined that the rehabilitation of the Central Shoe Building is not consistent with the historic character of the property and the historic district in which it is located, and that the project does not meet Standards 2, 3, and 9, of the Secretary of the Interior's Standards for Rehabilitation. Therefore, the denial issued on November 20, 2008, by Technical Preservation Services (TPS) is hereby affirmed. However, I have further determined that the project could be brought into conformance with the Standards, and thereby be certified, if the corrective measures described below are undertaken.

Built ca. 1918, the Central Shoe Building is located in the Washington Avenue Historic District, and was certified as contributing to the significance of the district on April 20, 2005. The completed rehabilitation of this "certified historic structure" was found not to meet the Secretary of the Interior's Standards for Rehabilitation owing to the addition of balconies to the rear (north) elevation and to changes to the ground floor openings in the west and north elevations.

The three elevations of the Central Shoe Company Building each reflect different aspects and functions of the historic business. The south elevation faces Washington Boulevard, a major thoroughfare that is the basis for its street address. It is distinctly commercial in character with the retail/office entrance to the business and commercial spaces at street level. The north elevation, facing Lucas Street, reflects the manufacturing end of the business, with a distinctly industrial character featuring an exposed concrete frame, inset brick spandrels and large steel sash windows, and loading docks at street level. The west elevation faces 17<sup>th</sup> Street and has features from both of the other facades of the building. Most of the west elevation matches the commercial character of the south elevation, but the change in grade precluded pedestrian entrances and, at the north end, provided vertical clearance for three additional bays of loading docks, matching those on the north elevation. Historically, there were two sets of exterior fire escapes, one at the east end of the north elevation, still extant at the beginning of the project, and the other, removed by a previous owner, at the south end of the west elevation.

I have determined that the already completed project severely compromises the industrial character of the north elevation by removing the fire escape and installing twenty-four new balconies in three ranks, and

by replacing the heavy framing of the loading docks with light storefront framing. The new balconies give the building a residential appearance incompatible with its historic industrial character. Similarly, the storefront framing is incompatible with the historic character of the loading docks. As a result, I find that the changes to the north elevation violate Standards 2, 3, and 9. Standard 2 states, "The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided." Standard 3 states, "Each property shall be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or architectural elements from other buildings, shall not be undertaken." Standard 9 states, "New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment."

I have also determined that the west elevation has lost its hybrid character by removing the heavy framing of the three loading docks and replacing it with light storefront framing. The new storefronts replicate the pattern, albeit in a different color, of the storefront framing on the rest of the west elevation, creating a false sense of history. As a result, I find that the changes to the west elevation violate Standards 2 and 3, cited above.

While the project as completed cannot be approved, I have further determined that the project can be brought into conformance with the Standards, and thereby achieve the requested certification, if corrective measures are undertaken. Specifically, the center and west ranks of new balconies on the north elevation must be removed. The east rank of new balconies, in the location of the former fire escape, may remain. In addition, the character of the former loading docks must be restored on the north and west elevations. The revised design for the west elevation you presented at the appeal hearing appears to match the visual characteristics of the original loading docks sufficiently to comply with the Standards. This revised design may also be appropriate for the north elevation. These corrective measures would allow the project to be certified as meeting the minimum requirements for certification established by law.

If you choose to proceed with the corrective measures described above, before commencing work, I strongly recommend that you submit an amendment to the Part 2 application describing the proposed changes to Technical Preservation Services, National Park Service, Attention: \_\_\_\_\_ with a copy to the Missouri State Historic Preservation Office. Note that this project will not become a "certified rehabilitation" eligible for the tax incentives until it is so designated by the NPS.

As Department of the Interior regulations state, my decision is the final administrative decision regarding certifications of significance. A copy of this decision will be provided to the Internal Revenue Service. Questions concerning specific tax consequences of this decision or interpretations of the Internal Revenue Code should be addressed to the appropriate office of the Internal Revenue Service.

Sincerely,



John A. Burns, FAIA  
Chief Appeals Officer  
Cultural Resources

cc: SHPO/MO  
Internal Revenue Service